

N60508.AR.000552
NAS WHITING FIELD
5090.3a

LETTER REGARDING U S NAVY RESOLUTIONS TO U S EPA REGION IV COMMENTS ON
REMEDIAL INVESTIGATION FEASIBILITY STUDY WORK PLAN NAS WHITING FIELD FL

8/28/1990
NAVFAC SOUTHERN



03.01.00.0006

1 D00032

Mr. James H. Scarbrough
Chief RCRA & Federal Facilities Branch
Waste Management Division
Environmental Protection Agency, Region IV
345 Courtland St.
Atlanta, GA 30365

Subj: NAVAL AIR STATION WHITING FIELD RI/FS WORK PLAN APPROVAL, PHASE I

Dear Mr. Scarbrough:

Your 14 August 1990 letter to Captain Johnson at NAS Whiting Field (NASWF) withheld approval of the subject work plan due to three issues: PVC vs stainless steel well construction, decontamination procedures, and work plan justification regarding Site 2. These issues, among others, were discussed at the 21 August 1990 meeting between Nancy Dean and Mickey Hartnett of EPA and representatives of this office. Based on this meeting and discussions with your office, the Navy would like to outline the proposal to resolve these three issues:

1. PVC vs stainless steel well construction:

Eight PVC monitor wells/piezometers are proposed at NASWF as part of PHASE I activities. The Navy fully understands that data from these wells will be subject to scrutiny with respect to the PVC vs stainless steel issue. Additional wells will be installed at these sites as necessary based on the data collected during Phase I. Additional wells recommended under Phase II will be presented in the Phase II Work Plans along with a full site-specific justification for construction materials. The Phase II Work Plans will be presented for your review and approval.

2. Decontamination procedures:

The Navy will follow EPA decontamination procedures at NAS Whiting Field for both sampling and drilling equipment. A complete description of this and all decontamination procedures that are used during the program will be presented in both the technical memoranda and the actual RI Report.

3. Work plan discussion and justification, Site 2:

Records gathered during the Initial Assessment Study (IAS) indicate that Site 2, Northwest Open Disposal Area (commonly referred to as "the wood dump"),

09B
115
11515
Daily
WANG 1477L p9-10

115
1151
11515x
CLH
8/29/90

4682
SUBJ: NAVAL AIR STATION WHITING FIELD RI/FS WORK PLAN APPROVAL, PHASE I

was used for construction and demolition debris, trees, tires, furniture, etc. Potential hazardous wastes were disposed at other landfills active at the time which were designated for hazardous wastes.

The IAS concluded that further investigation at Site 2 was not warranted. EPA and FDER agreed with this conclusion as no further mention is made regarding Site 2 in their review of the IAS or Verification Work Plans & Study. Because the existing data do not indicate a hazardous problem and the site was considered to warrant no further investigation, Site 2 was not proposed in the RI/FS Work Plans.

In order to verify this position the Navy agrees to propose the following activities for Site 2:

- During Phase I, one Piezocone Penetrometer Test (PCPT) will be performed at Site 2 to obtain an accurate description of the soil profile for the local area, including potential clay layers and perched water conditions. This, coupled with the Phase I base-wide potentiometric mapping, will allow for proper vertical and horizontal positioning of a verification monitor well.
- During Phase II, a verification monitor well will be installed at Site 2 in the area of greatest potential for contamination, and a full Target Compound List (TCL) analysis will be performed on the collected groundwater sample. This work will be presented in the Phase II Work Plans and submitted for your review and approval.
- Data from the PCPT investigation, well installation, and groundwater analysis will be presented in both the Technical Memoranda and the Results Summary Report. If no contamination is found, the Navy will present a written summary of the information and data associated with Site 2 that will serve as justification for omitting Site 2 from the RI/FS.

It is the Navy's understanding that this proposal satisfies EPA's Phase I concerns. Upon receipt of your formal response to these changes, the Navy will initiate the RI Phase I field work. The Navy appreciates your input into NAS Whiting Field's RI/FS Work Plans. Please call Mr. Ted Campbell at (803) 743-0576, if you have any questions regarding this work.

Sincerely,

G. C. BRADLEY, P.E.
HEAD, REMEDIAL ACTIVITIES BRANCH

Copy to:
EPA (Ms. Nancy Dean)
EPA ESD Athens (Mr. Bill Bokey)
FDER (Mr. Eric Nuzie)
NAS Whiting Field (Mr. Jerrel Anderson)